

National Carer Organisations response to: Pension Age Winter Heating Payment in Scotland



Scotland's National Carer Organisations are [Carers Trust Scotland](#), [Carers Scotland](#), [the Coalition of Carers in Scotland](#), [MECOPP](#), [Shared Care Scotland](#), and the [Scottish Young Carers Services Alliance](#).

Together we have a shared vision that all Scotland's unpaid carers will feel valued, included and supported as equal partners in the provision of care. We aim to achieve this through the representation of unpaid carers and giving them a voice at a national level. We believe we can deliver more for unpaid carers by working together to share our knowledge and experience, and by focusing our collective efforts on achieving improvements in areas of policy and practice that are of greatest concern to unpaid carers.

We welcome the opportunity to respond to the Pension Age Winter Heating Payment in Scotland consultation.

The views of the response are from all of the National Carer Organisations in Scotland listed above.

1. Do you agree or disagree with the proposal to replace Winter Fuel Payment with a 'like-for-like' replacement?

Agree

[Please provide further information on why you agree or disagree.](#)

To a certain extent, we agree with the proposal to replace Winter Fuel Payment with a 'like-for-like' replacement as the payment helps thousands of people with their heating costs during the colder months.

However, we would like to see the eligibility for this payment to be extended to include unpaid carers of all ages, and not be exclusive to those born on or before 24 September 1957 (for 2023/24).

For many unpaid carers, paying energy bills can be a struggle, especially with the impact of the cost-of-living crisis in recent years, with some having to choose between heating their homes and buying food. Unpaid carers may be caring for someone who is ill, frail or receiving end of life care, it is critical that they are able to maintain a warm home. Also, given that they are often providing well above 50+ hours of care a week, they will be spending a significant amount of time at home, increasing their energy consumption and ultimately their energy bills.

No unpaid carer should have to choose between buying food and essentials or heating their home, which is why we believe greater financial support is needed for all unpaid carers and this payment should be extended to include all unpaid carers.

2. Do you agree or disagree that this approach is an effective way for the Scottish Government to provide financial support for older people?

Agree

Do you have any further comment on the potential longer term development of this benefit in order to provide the most effective support?

We agree that this payment is an effective way for the Scottish Government to provide financial support for older people. It is critical that financial support is given to those in the colder months to ease the financial pressure of energy bills, especially in recent years with the rapid increase of bills due to the cost-of-living crisis, to ensure that older people are able to maintain a warm home.

However we believe that a longer term development of this benefit should include wider eligibility so as to include unpaid carers of any age who are struggling to pay their energy bills.

In September 2023, Carers Trust Scotland published a Scotland summary report from a UK wide adult unpaid carer survey, which highlighted many unpaid carers in Scotland are experiencing financial hardship. This can be due to an impact on employability due to their caring role, by having to reduce their number of working hours to care for someone, or having to fully give up work. In some cases, many unpaid carers have never been able to attain employment due their caring role and have relied on Carer's Allowance. However, it was found that the financial support through this benefit, as well as Carer's Allowance Supplement, was not enough to support them. Just 30% of respondents said Carer's Allowance was enough to make a meaningful difference to them, and 36% said Carer's Allowance Supplement was enough to make a meaningful difference.

Another important element in this argument is that households that include a disabled person often have higher electricity bills already due to the cost of running medical equipment.

It is therefore critical that unpaid carers are valued for their caring roles and financially supported so that they are able to maintain caring and not be a risk of falling into poverty. We believe that this payment would be of significant benefit for unpaid carers of any age who are currently struggling with their energy bills and could help to start to remove the financial stress they are experiencing.

3. Do you agree or disagree with the proposal to name the replacement for Winter Fuel Payment in Scotland 'Pension Age Winter Heating Payment' (PAWHP)?

Disagree

Please provide further information on why you agree or disagree.

We disagree with the proposal to name the replacement payment 'Pension Age Winter Heating Payment'. We would argue that the payment should be extended to include unpaid carers of any age who struggle to pay their heating bills. The current recommendation for the name, therefore, does not factor in for future improvements to the payment to include unpaid carers.

Data published by the Scottish Government found that in May 2023 83,000 unpaid carers were in receipt of Carer's Allowance, however there is an estimated 800,000 unpaid carers across Scotland. We would suggest that this heating payment be extended to include those unpaid carers who are in receipt of Carer's Allowance as well as those of Pension age.

4. Do you agree or disagree with the proposal to continue making payments to clients in November or December each year?

Disagree

Please provide further information on why you agree or disagree.

We recognise that the current payment date of either November or December reflects in the change in season and the weather when households are more likely to increase their heating usage, which we welcome. However, we disagree that these payments should not be exclusive to either November or December. There should be greater flexibility of when recipients can receive this payment which should be extended to include January or February. Recipients should be able to choose when they would like to receive the payment which best reflects their needs and allows for greater financial planning over the winter months.

5. How could we improve delivery for households in remote rural and island communities that are not on the gas grid?

Consultation undertaken with carer services supporting unpaid carers who live in rural and island communities found that there had been an impact on many unpaid carers due to rising costs on coal and oil heating systems. In many examples, due to the condition of the cared-for person(s), the heating is required to be on for an extensive period of time which has caused a rapid increase in heating bills, even more so for oil and coal heating systems. We also heard reports of some unpaid carers and the cared-for person(s) living and sleeping in the same room so that they are only required to heat one room in the household in order to save money.

We suggest that alongside the heating payment, there should be an additional supplement for those who live in rural and island communities to account for the dramatic increase in fuel costs.

6. Do you agree or disagree that our universal approach to identifying eligibility should be based on reaching state pension age?

Disagree.

Please provide further information on why you agree or disagree.

As previously stated, the National Carer Organisations believe that eligibility for this support should be extended to unpaid carers of any age who are struggling to pay energy bills.

7. Do you agree or disagree that the eligibility criteria for the PAWHP are clear?

Agree.

Please provide further information on why you agree or disagree.

We agree that there is clear eligibility criteria, although there could be improvements to make this more accessible. We would advise using plain English where possible and we welcome commitments set out in the EQIA for translating into a number of community languages. This is especially important as 11% of Scotland's Minority Ethnic population of 369,000 in 2011 reported not being able to speak English well or at all. The experience of the Minority Ethnic Carers of People Project (MECOPP) also indicates lower levels of literacy in both English and community languages for some Minority Ethnic communities, so we would recommend creating audio-visual resources in addition to improving accessibility.

8. Do you agree or disagree with the proposal to retaining the current value of payments?

Disagree.

Please provide further information on why you agree or disagree.

We disagree with the proposal to retain the current value of payments and believe that payments should be increased in line with inflation and to reflect the dramatic increase in energy bills over the past few years.

Research published by Carers Trust Scotland in March 2023, *Experiences of Older Adult Unpaid Carers in Scotland*, asked unpaid carers aged 65 and above about the initial impacts of the cost-of-living crisis towards the end of 2022. When asked how their spending habits had changed in the past 12 months, 37% of respondents said they had used less gas and electricity in their homes as a means to save money. The rapid increase in gas and electricity prices have meant many unpaid carers have had to cut back on heating their homes in order to save money.

There are many hidden costs of maintaining a caring role, such as an impact on employability and income. Due to the nature of some caring roles, which may require to maintain a warm home or substantial use of electricity for medical equipment, unpaid carers are disproportionately impacted by an increase in gas and electricity prices, and the new payment should be increased to reflect these impacts.

9. Do you agree or disagree that people in residential care who do not receive the income-related benefits listed should receive half of the 'full' rate of PAWHP?

No response

10. Do you agree or disagree with the proposal for PAWHP to be given to clients in the form of a cash payment and not another form?

Agree

Please provide further information on why you agree or disagree.

We agree with support through cash payments, although we would hope that consideration be given to those who do not utilise traditional banking. For instance, a study in 2015 from interviewing people from the Gypsy/Traveller community in 2015 showed 20% of those interviewed did not have bank accounts. This demonstrates the importance of having flexible payment arrangements to ensure that nobody is unfairly disadvantaged.

11. Do you agree or disagree with the proposal to pay PAWHP as an annual one-off payment each winter?

Agree

Please provide further information on why you agree or disagree.

We have discussed the system of payments with service users of some of the organisations the National Carer Organisations represent. There has been a varied response with some unpaid carers saying they prefer the current system and others stating that they would prefer two or more payments across the winter. We would suggest that there is perhaps some scope for flexibility on this and that more than one option be provided, depending on individual needs and circumstances. This would allow people to choose between one or multiple payments. However we are not in principle opposed to an annual one-off payment.

12. Do you agree or disagree with the proposals for providing a way for people to opt-out of receiving PAWHP?

Agree

13. Do you agree or disagree with the proposal to continue having the 'qualifying week' in September to identify eligible clients?

Agree

14. Do you agree or disagree with the proposal that clients have 31 days to request a re-determination?

Disagree

Please provide further information on why you agree or disagree.

We believe that 31 days is too short a period of time to allow for requesting a re-determination and therefore disagree with this proposal. Many unpaid carers have significant time commitments related to their caring responsibilities. In the *2022-23 Carers Census, Scotland*, 55% of unpaid carers supported by local services provided 50 hours or more care per week. 31 days will add undue pressure to many unpaid

carers who may not have the time in that period to complete the request for re-determination.

In cases where being an unpaid carer intersects with protected characteristics, such as those who are from minority ethnic backgrounds, this can compound these issues. For instance, linguistic barriers can provide a major challenge. 11% of Scotland's minority ethnic population spoke limited or no English in 2011, and in the same census over 12,000 people from minority ethnic backgrounds were unpaid carers. This means there will be additional barriers such as translation services and can lead to greater delays.

We would recommend a significantly longer period than 31 days to request a redetermination and would suggest that 42 days provided for certain benefits be given instead. If the period remains at 31 days, a list of circumstances where flexibility can be considered in making a late application should be considered and published. We would ask that this could include caring responsibilities and those with language barriers. This clarification will help ensure consistency.

15. We have proposed that Social Security Scotland have a period of 56 working days to consider a re-determination of PAWHP. Do you agree or disagree with this proposal?

Disagree

Please provide further information on why you agree or disagree.

We are concerned with the length of time that this would take. This can lead to greater uncertainty and have a significant impact on those such as unpaid carers who often are in financially more challenging situations. According to the *Carers Scotland State of Caring 2023* report, 28% of unpaid carers are struggling to make ends meet. The report also goes on to show that for older unpaid carers over the age of 65, 21% are cutting back on essentials such as food and heating.

With this benefit being specifically aimed at helping to support those of pension age with the costs of heating, it is imperative that for those awaiting the outcome of a redetermination who may have caring responsibilities receive an outcome sooner rather than later. A wait of 56 working days could potentially have a knock-on effect on other finances. We would recommend limiting the time for considering the redetermination to 31 days.

16. Can you identify any potential unintended consequences which we have not considered in these proposals?

No response

17. Please set out any information you wish you share on the impact of PAWHP on groups who share protected characteristics.

In the Equality Impact Assessment on paragraph 43, it states *"While it is clear that older people from ethnic minority communities experience numerous barriers, we have not identified any particular barriers resulting from our policy approach which may affect people based on race."* We would argue that this is not the case.

For instance, in Paragraph 38, it states that Gypsy/Traveller Communities are less likely to utilise central heating (at more than double the rate of non-Gypsy/Traveller households. Often this means that their heating costs are higher, and there needs to be consideration to ensure that people are not disadvantaged economically based on protected characteristics, including race. The flat rates of payment that currently exist and are proposed to be maintained will continue to enshrine that inequality.

We welcome the commitments made in Paragraph 42 on the EQIA on creating accessible resources, but we would argue that it does not go far enough. The MECOPP briefing on *Producing Accessible Information for BME Communities* provides useful information on how to develop this. The report details how 6.3% of people in Scotland in the 2011 census were not able to speak, read and write English.

We would suggest following some of the proposed solutions, such as providing more audio-visual information in community languages, as there are lower literacy rates in some BME communities. Furthermore, the 'easy read' versions could have negative connotations, and we would suggest having a 'Plain English' version of documents. Finally, we would recommend concerted effort to work with BME community groups to both ensure information is provided, improve engagement and also upskill these groups.

Finally in the payment options in paragraph 39, there needs to be consideration to ensure everyone has equality of access. This is particularly important for those who do not utilise traditional banking. As previously mentioned, a higher proportion of those from the Gypsy/Traveller Community have been reported as not having a traditional bank account. For those without access to traditional banking, it is unclear that the i-Movo option reference in the paragraph will function if they are not digitally literate.

18. Please set out any information you wish to share on the impact of PAWHP on businesses

No response

19. Please set out any information you wish to share on the impact of PAWHP on Island Communities

No further response

20. Please set out any information you wish to share on the impact of PAWHP on reducing inequality of outcome caused by socio-economic disadvantage.

Unpaid carers are more likely to be living in poverty than non-carers, with the poverty rate for unpaid carers remaining higher than for those without a caring role - 29% compared with 20% (an increase from 24% on the previous year) [1]. Unpaid carers who have taken time out of employment or reduced hours are likely to have lower retirement incomes than non-carers [2]. Carers Scotland's *State of Caring 2023*, found that nearly a third (30%) of unpaid carers are struggling to afford the cost the cost of energy found that 21% of older unpaid carers are cutting back on essentials like food and heating [3].

“Keeping heating off as gas bill has been too high - £182 one month - so now we sit with blankets if it’s cold as our state pension is not enough to pay huge utility bills” (Carer, State of Caring 2023) [3].

Unpaid carers also face additional health challenges on top of those caused by caring. 67% of unpaid carers said that the financial challenges they face is impacting their mental and physical health. PAHWP can be one part of package of financial and practical support carers to support the disadvantage they face.

[1] Joseph Rowntree Foundation, Poverty in the UK 2023.

[2] <https://www.pensionbee.com/carers-pension-gap>

[3] Carers Scotland, State of Caring 2023 “I’ve got no money at all”: The financial impact of caring in Scotland

21. If there is anything else you would like to tell us about the described policy intention, impact assessments or PAWPH in general, please do share here.

No further response

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